

asserted against Individual Defendants, has developed familiarity with this Court's rules, and is fully prepared to proceed in this Court for this case. Ms. Venkatesh has also been assisting in this matter since the time that the Individual Defendants were named herein, has experience practicing in federal courts, and has developed familiarity with this Court's rules. Furthermore, Mr. Selinidis, whose principal office is located in Houston, Texas, has been a practicing attorney in Texas since 2006, has practiced in federal courts throughout this State, and is fully prepared to assist in this matter. Lastly, undersigned counsel does not anticipate any issues with respect to the geographical distance between counsel's office and the Northern District, and like lead counsel for Plaintiff, who has been granted permission to proceed without local counsel, counsel's principal office is located in Washington, DC.

WHEREFORE, for the above stated reasons, Individual Defendants pray that the Court grant its request to proceed in the above-captioned case without local counsel. If such request is granted, local counsel of record will request withdrawal from this matter.

Dated: May 7, 2018

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

This is to certify that on May 3rd, 2018, counsel conferred with William B. Mateja and David Rockwell Bower (local counsel), Jason McElroy (counsel for Plaintiff), Jason Elliot (counsel for Defendant Pacific Union Financial LLC), and Braden Wayne (counsel for Defendant John Perry), and all stated they are UNOPPOSED to the relief sought in this Motion.

By: /s/ Tyree P. Jones Jr.
Tyree P. Jones, Jr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May 2018, a true and correct copy of the foregoing Unopposed Motion for Leave to Proceed Without Local Counsel was submitted with the clerk of the court and served upon all counsel of record using the CM/ECF system of this court.

By: /s/ Tyree P. Jones Jr.
Tyree P. Jones, Jr.